

**Senate Bill 1041 Implementation
Field Monitoring
Visit Summary**

San Luis Obispo County

April 15, 2014

CALIFORNIA DEPARTMENT OF SOCIAL SERVICES
Welfare to Work Division
Todd R. Bland, Deputy Director

San Luis Obispo County
Senate Bill (SB) 1041 Implementation
Field Monitoring Visit Summary

Executive Summary

Purpose of Field Monitoring Visit

The purpose of the Senate Bill (SB) 1041 Implementation Field Monitoring Visit is to obtain information regarding the county's progress in implementing program changes enacted by SB 1041 (Chapter 47, Statutes of 2012).

Scope of Field Monitoring Visit

Specifically, the California Department of Social Services (CDSS) will review how each County Welfare Department (CWD) implemented SB 1041 program changes, including but not limited to:

- New Welfare to Work (WTW) participation requirements;
- WTW 24-Month Time Clock;
- Reengagement of the former short-term young child exempt population (Assembly Bill [AB] 4X 4 group);
- County staff knowledge of SB 1041 changes;
- Training provided to staff in order to implement these changes; and
- Any pertinent data related to these program changes that are available.

Goals of Field Monitoring Visit

The CDSS' goals are to ensure that SB 1041 is being implemented correctly by each county, to gather promising practices in regards to implementation, to share these promising practices (when able) amongst all counties throughout the state, and to determine whether systematic or program issues relating to the integration of SB 1041 changes into the existing California Work Opportunity and Responsibility to Kids (CalWORKs) and WTW program exist throughout the state. If such issues exist, they will be addressed by the SB 1041 Oversight Workgroup.

County Visit General Information

The one-day field visit was performed in San Luis Obispo County on Tuesday April 15, 2014 at the Central Regional Office in the city of San Luis Obispo, CA. The CDSS field visit team from CalWORKs Employment and Eligibility Branch included CalWORKs Branch Chief, CalWORKs Program Manager and a CalWORKs Program Analyst. Personnel from the Department of Social Services of San Luis Obispo County included County Assistant Director, County Regional Manager, County Staff Development Division Manager, CalWORKs/WTW Program Manager, CalWORKs Program Review Specialist and two CalWORKs Employment Resource Specialists IVs. The field visit consisted of a kick-off meeting, close-out meeting, staff interviews, and case management observations with county staff.

Implementation Strategies

In December 2012, San Luis Obispo County CalWORKs/WTW Program Manager and Program Review Specialist started their detailed SB 1041 training that included Employment Resource Specialist (ERS) 1, 2, 3 and 4s. An SB 1041 overview was presented to each of these staff. This presentation included a PowerPoint presentation on SB 1041 changes and a detailed time line for the county's phases of implementation.

Additionally, Employment staff received training in:

- techniques and strategies for conducting a successful SB 1041 interview;
- transitioning WTW participants to SB 1041 program requirements; and
- how to amend or develop a SB 1041 WTW 2 plan.

Key Recommendations

For applicants who walk through the door for the first time, the county should endeavor to reduce the number of return office visits participants must make while the county determines if the individual is eligible for services. One approach may be combining some of the current steps of consultation, intake, orientation, appraisal and assessment during an office visit. The Online CalWORKs Appraisal Tool (OCAT) launching this year may help streamline the current county process. Additionally, Family Stabilization services should also include crisis intervention services so participants may become more able to perform Welfare-to-Work activities and receive supportive services. Also the county should develop procedures to implement requirements for learning disability (LD) screening and waiver as the current practice of relying on participant's to self-report LD does not meet the CDSS requirements. Guidance to counties on the subject of LD screening and waiver is found in the CDSS' All County Letter (ACL) 04-48 and ACL 01-70.

Acknowledgments

The CDSS thanks the Department of Social Services of San Luis Obispo County for hosting the field monitoring visit and in particular the cooperation of county personnel Tracy Schiro, Connie Willard, Debbie Aiello, Jenny Hart, Michelle Arauz, Kerri Cuellar and Maria Lerma. The CDSS appreciates the open collaboration with county staff to ensure the continued success of the CalWORKs program.

Field Monitoring Visit Summary

Introduction

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Background and Data

San Luis Obispo At-a-glance

Total Caseload.....	1,880
(Source: CalWORKs Cash Grant Caseload Movement Report CA 237 CW Line Item 8a- February 2014)	
WTW Enrollees.....	675
(Source: CalWORKs Welfare-to-Work Monthly Activity Report WTW 25/25A Line Item 1-February 2014)	
Mandatory Participants (enrollees + sanctioned + non-compliance).....	795
(Source: CalWORKs Welfare-to-Work Monthly Activity Report WTW 25/25A Line Items 1, 3A, and 31-February 2014)	
Reengagement Plan Received.....	Yes
Beginning Date of Reengagement.....	August 1, 2013
Consortium System.....	CalWIN

Note: San Luis Obispo County states the February 2014 Total Caseload data of 1880 clients is not reflective of the population they were ensuring had the comprehensive discussions. The county only counted the population that was on aid as of January 1, 2013 as necessary to have a one-on-one comprehensive discussion. As of January 2013 the county changed all WTW Orientation information to include everything that was required in a comprehensive discussion so that all new participants would only get the new information. The County also created a policy and procedure specifically detailing all required discussions that should happen at CalWORKs intakes.

Data/Statistics:

- Clients who had more than 24 months left on their CalWORKs 48-month time limit as of January 1, 2013, that have had their comprehensive discussion: **148**
- Clients who had less than or equal to 24 months left on their CalWORKs 48-month time limit as of January 1, 2013, that have had their comprehensive discussion: **900**
- Sanctions that were cured as a result of SB 1041: **5**
- Former short-term young child exempt clients (Assembly Bill [AB] X4 4) that have been reengaged: **53**
- WTW plans that have changed as a result of SB 1041 implementation: **48**
- Clients that have used the new once in a lifetime young child exemption: **154**
- Other statistics that the county is keeping related to SB 1041 implementation: None

Summary of Documents provided by San Luis Obispo County:

- Instructional announcements provided by the county to county staff relevant to SB 1041 implementation. (Appendix I)
- Informing notices and flyers provided to clients relevant to SB 1041 implementation. (Appendix II)
- SB 1041 related training materials (formal and informal) including, but not limited to a list of training strategies, materials available on-line, and materials distributed during staff meetings. (Appendix III)
- San Luis Obispo County's Reengagement Sequencing Plan. (Appendix IV)

County Administrator and Caseworker Interviews

The CDSS Field Monitoring Team used the county administrator and caseworker interview tools released in All County Information Notice (ACIN) I-42-13 to interview the county administrator and case workers in-person regarding SB 1041 implementation. The tool was provided to the county administrator and caseworkers in advance of the visit. The administrator interview panel consisted of three CDSS staff with one county administrator. The caseworker interviews were conducted by three CDSS staff members with two county caseworkers.

Summary of Observations

WTW 24-Month Time Clock Implementation and New WTW Participation Requirements

San Luis Obispo County sent out to all CalWORKs WTW participants in January 2013 the Time Clock General Informing notice (CW 2205) and subsequent to that the notice CW 2208 which tells participants the number of hours they have on the 24 month clock. Prior to SB 1041, the county did not consistently use the CW 2186A CalWORKs Exemption Request form to determine participant exemptions. In January 2013 the CW 2186A form was added to all Intake and annual redetermination packets and in June was added to all reengagement information sent to participants formerly eligible for the Old Small Child Exemption.

San Luis Obispo County developed their own county notification forms that accompanied the CDSS forms for the different subgroups based upon the number of months on CalWORKs 48 month time clock.

The county staff with job titles Employment Resource Specialist (ERS) 1, 2 and 3 handle intake and continuing eligibility. If a case has potential eligibility to Welfare to Work (WTW) it is transferred to an ERS 4, if not it receives services by a continuing ERS 1, 2 or 3. The ERSIV handles both the ongoing eligibility and all employment service needs of their cases as well as family stabilization services. The case remains assigned to them until they discontinue from CalWORKs. doing the WTW casework are generalist who remain assigned to a case throughout its time on aid and perform case management functions as well as family stabilization services. As of January 2013 ERS 4s became responsible to handle eligibility which includes Semi-Annual Reporting (SAR) 7, redeterminations and case changes. The average caseload size for each ERS IV was decreased to due to increasing responsibility and to offer intensive services by the addition of ERS IV positions in November 2013 and April 2014.

For participants with Less than 24 months left on their CalWORKs 48-month time limit

For participants with less than or equal to 24 months left on their CalWORKs 48-Month Time Clock the county sent forms DSS ES 215, DSS ES 214 and CW 2208 to inform the participant of all changes and gave them the option to change their WTW plans.

On January 1, 2013, the county had 900 individuals with less than or equal to 24 months left on their 48-Month CalWORKs Time Clock and the county began comprehensive discussions with these individuals in March 1, 2013. By March 19, 2014 all 900 individuals had been properly notified through use of county and CDSS forms and had an opportunity for a meeting for the comprehensive discussion.

For participants with more than 24 months left on their CalWORKS 48-month time limit

On January 1, 2013, participants who had more than 24 month left on their 48-Month CalWORKs Time Clock were sent forms DSS ES 216, DSS ES 214 and CW 2208 that gave an appointment date to come in and have their comprehensive discussion.

On January 1, 2013, the county had 315 individuals with more than 24 months left on their 48-Month CalWORKs Time Clock. All 148 of 315 original individuals that continued their cases and remained active from January 2013-April 2014 had their comprehensive discussion by April 30, 2014.

For participants with more than 24 months on their 48-month time clock, if the participant had an existing plan that met or exceeded the new participation requirements, the county sent the participant a new WTW plan to sign that contained the same activities and participation hours as the participant's existing plan and requested the participant sign and return the new WTW plan to the county, or contact the county within 30 days of the date on the letter if he or she wanted to change the plan based on the new rules. If the participant did not return the plan or contact the county in response to the letter, the participant's WTW 24-Month Time Clock would start the first of the month after the date that the 30-day time period had ended, unless the participant's existing plan met the federal standards. If the participant met participation requirements, the participant would not be sanctioned for failure to contact the county or return the new plan.

If the participant did not have an existing plan that met the new participation requirements and did not respond to the county, the county began the WTW non-compliance process. While new WTW participants must always have a WTW plan, existing participants (on aid and employed prior to January 1, 2013) are not required to have a new plan if all hours are met through employment. If a participant satisfactorily met participation hours through employment, the county did not sanction the participant and the caseworkers were instructed to obtain the WTW plan signature at the next regularly scheduled appointment.

If the participant contacted the county to change his or her WTW plan but the county could not serve the participant right away, the participant was considered in the process of developing a WTW plan. No months counted against the participant's WTW 24-Month Time Clock until the participant signed a new WTW plan.

If participants are NOT meeting WTW requirements, they are to be screened for good cause and if none exists, put into the compliance process.

Clients who failed to attend SB 1041 appointments:

The county did not require participants that had 24 months or less on their 48 month time clock to come into the office, but invited them to come in for their comprehensive discussion of program changes. If they did not come into the office or make connection in another manner, no further action was taken. For participants that had 24 months or less on their 48-month time clock and met their original WTW requirements, the comprehensive discussion would take place at the next annual renewal appointment or their next scheduled visit. If the participant was sanctioned and had less than 24 months on the 48 month time clock a comprehensive discussion was offered, but the participant was not required to attend.

The county's action of sending the forms DSS ES 215 and CW 2208 to participants with less than 24 months on the 48-month clock who did not respond met the SB 1041 participant notification requirement as described by CDSS.

General Comments

Welfare-to-Work ERS IV caseworkers have approximately 60 to 70 active WTW cases and the order in which the cases were chosen for informing notices and appointment for the comprehensive discussion was detailed in a timeline the county developed. The three groups and the order of notice/meeting was: reengagement and sanctioned; participants with more than 24 month on their 48 month time clock and finally participants with less than 24 months on their time clock. Sanctioned cases were treated the same as compliant cases and were included in all notices that applied to them.

New Young Child Exemption

There were a significant proportion of cases that chose the new once in a lifetime new young child exemption and the county reported 154 participants to date have elected to take this exemption.

The new WTW Activity Plan/Form (WTW) 2

The new WTW 2 form was manually completed by caseworkers from January 1, 2013 until it was available through the CDSS website. The data from the WTW 2 is entered into CalWIN after completion.

General Comments

The caseworkers interviewed felt that the WTW 2 is effective as a guide during a client's SB 1041 discussion. It allows the participant to have a visual on the different options they can select from. However, they also noted that some clients get a little confused when they see the same activities listed on both sides of the form under CalWORKs and Federal Work Activities. In some cases, participants are unable to choose and asked that the caseworker make the choice(s) for them.

One technique mentioned by an ERS IV that is used to ensure participant comprehends the WTW 2 plan that is developed with them is to ask the participant to look at the plan and add up the participation hours for activities listed on the plan.

Reengagement Process

San Luis Obispo County's Reengagement Sequencing Plan (Bill X4 4) is as follows:

- Mass mailing of Reengagement Informing Notice (CW 2206) started in January 2013 and was sent every six months to ensure the timeline for the requirement of adequate informing was met.
- The county's reengagement process officially began with appointments starting in August 2013 and ended July 2014 with some reengagement completed each month at redetermination.
- Participants have the opportunity to reengage sooner if they wish and this was accomplished by volunteer plans until the county was able to send out notices.
- Participants were not encouraged to reengage early as there was not benefit for doing so as the county supported existing and new voluntary plans. The county describes their progress as "slow and steady."

The reengagement process for San Luis Obispo County includes the following:

- Reengagement Reports for ERS IV were generated monthly and aligned with redeterminations that needed CW 2206 personalized reengagement letter.
- County's Reengagement Packet (DSS ES 214) included forms CW 2186A (Exemption Request) and packets sent June 2013 were for August 2013 appointments.

During the appointment, clients are provided with a general description of supportive services available, program requirements and the new flexibility under SB 1041. Caseworkers determine clients' status and needs and if another WTW exemption applies. Additionally, clients are informed of their remaining number of CalWORKs 48 months, assigned appropriate WTW activity(ies) that include the identification of barriers.

Volunteers

AB X4 4 short term exempt clients wishing to volunteer in the WTW program prior to December 31, 2012 or after were allowed to continue volunteering until they had been formally reengaged. For clients who requested to reengage ahead of the sequencing schedule they had been informed that if they chose to participate prior to the reengagement sequencing plan, their CalWORKs 48-month time limit, unless meeting a clock stopper reason, would begin to tick on the first of the following month from the date a new or amended WTW 2 Plan was signed. These clients were offered the option to either reengage early or wait until their reengagement prioritization. Clients who chose to reengage earlier followed the reengagement process. Clients are allowed to waive the 60 day informing period.

Implementation Strategies

The county developed its own training materials including county forms, packets, scenario discussions and policy and procedures. The general approach by county Staff Development was to use the recently released CDSS Question and Answer (Q&A) ACLs and information from the CalWORKs Advisory Team (CAT) meetings as the basis for statements and guidelines for the training policy and procedure documents. Two Policies and Procedures documents were created – one for the WTW time clock and one for Small Child Exemption and Reengagement. From December 2012 through 2013, San Luis Obispo County Managers provided detailed SB 1041 training to Community Colleges partners, Managers and Participant Services staff that included an SB 1041 overview. The training for the Participation Services staff continues into 2014 as well.

Training for county staff included:

- Mandatory monthly meetings with ERS 4s (Caseworkers) responsible for WTW eligibility and employment services.
- December 2012 SB 1041 training to all ERS 1,2,3 and 4s.
 - January 2013 eligibility re-training for ERS 4s.
 - May 2013 training for reengagement plans for small child exemptions.
 - Throughout 2013 provided “cheat sheets”, time lines and pulled report for ERS 4s to track when redeterminations due and whether comprehension discussion completed.
 - WTW 2 completion strategy used with participants that do not need flexibility is to assign activity type and hours on form right side as much as possible to save months on 24 month time clock for future use.

General Comments

With the implementation of SB 1041 San Luis Obispo County has changed its practice to write plans of shorter duration and depending upon activity duration these plans can be three months long, a semester long and in some cases up to two years. The county's strategy of writing WTW 2 plans for two years is a longer duration than that used by other counties. With the many SB 1041 reform changes and increased options for activities, plans may need updating more frequently. The two year duration for WTW 2 plans is acceptable as long as the discussion on participant's overall goals continues during the extended time.

Case Reviews

The CDSS Field Monitoring Team reviewed five cases selected by the county in advance of the visit. The purpose of this component of the visit is to review how SB 1041 program changes are being integrated into case management, understand how SB 1041 policies are being operationalized by the caseworker, and better comprehend case management within the county.

There were five specific case types requested:

- Case One-a client with **less than or equal to** 24-months left on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Two-a client with **more than** 24-months on the CalWORKs 48-month time limit as of January 1, 2013;
- Case Three-a new client (beginning date of aid January 1, 2013 or later);
- Case Four-a client who is sanctioned that has earnings and is curable based on the new participation requirements (may be a case actually cured since January 1, 2013 based on new participation requirements); and
- Case Five-a client that is part of the former short-term young child exemption (AB X4 4)/reengagement population, and is currently in the process of or has been reengaged.

General Comments

San Luis Obispo County uses the CalWIN case management system. The cases shared at this visit had all received the appropriate notices and applicable benefits and supportive services. This included the issuance of the CW 2205 and CW 2208 when applicable in addition to the use of the new WTW 2. The form CW 2186A CalWORKs Exemption Request form was used later by the county and is now incorporated with participant's notifications. As mentioned earlier, for all cases reviewed the LD screening was not offered nor was there provided the chance to sign the LD waiver.

The county relies on self-report by participants for the identification of possible learning problems. The CDSS staff observed initially through review of cases and then confirmed through discussion with county staff that the county does not provide advance payment of childcare services to sanctioned clients participating in activities to cure his or her sanction. The provision of this supportive service if necessary for the client to participate in the curing activity is required under The Manual of Policies and Procedures (MPP) Section 42-750.21. Another observation, not specific to SB 1041 reforms, is clients who apply for aid the first time must make multiple return office visits during the determination of eligibility. The County should take steps to reduce the number of return office visits required for new CalWORKs applicants.

Conclusion

Successes

The county's improvements to the job search program in North County (Team Cuesta) by collaborating with the local community college to make it noncredited and more available to all WTW participants. The county partnered with the San Luis Obispo Chamber of Commerce to expand their subsidized employment program, SLOWorks! to ensure a position for everyone completing the Team Cuesta curriculum. The collaboration with the local community colleges has also resulted in ensuring their mutual participants receive the Work Study opportunities necessary to fill the required WTW activity hours.

The county's collaboration with the both Women's Shelters/Rape Crisis Centers (SLO County Women's Shelter and RISE). The county has partnered with both centers to create an in depth two day training for all ERS IVs to enhance their knowledge on the affects of domestic abuse as well as detailed training on domestic abuse waivers and exemptions.

The Caseload Management Log Database is an impressive case management tool that streamlines caseload data pulled from CalWIN and Service Management Access and Resource Tracking (SMART) for a user friendly profile of important caseload dates and status. This tool is used daily by the ERS 4s to assess what needs to be done on each case and serves as a tool for the supervisors as well to review and monitor case status.

Hiring more ERS 4's to lower average size of caseloads of active WTW cases to a manageable size that will allow more intensive case management. Monthly meetings with Employment staff to discuss issues such as managing caseload and training. The county provided very thorough training materials and checklists for implementing SB 1041 changes. The county created six client notices for SB 1041. San Luis Obispo is a Linkages county that coordinates services for children involved with Child Welfare and CalWORKs.

Challenges

- San Luis Obispo found that their greatest challenge was the implementation of such significant changes to the program in such a short amount of time. Additionally, caseworkers state at times it has been difficult explaining choices that are available to clients.
- Reevaluate the frequency in which participants need to come to the office.
- Utilizing the LD screen and waiver, if appropriate, and referring client to full assessment as needed. Family stabilization holds intensive case management services.
- CalWIN clean-up of the Time on Aid clocks.
- Streamline the referral process for greater and quicker access to needed mental health and substance abuse needs.
- Required provision of childcare services to former clients who are working on curing a WTW sanction.

Key Recommendations

For applicants who walk through the door for the first time, the county should endeavor to reduce the frequency of return office visits participants must make during determination of eligibility. One approach may be combining some of the current steps of consultation, intake, orientation, appraisal and assessment during an office visit. The OCAT launching this year may help streamline the current county process.

Additionally, Family Stabilization services should also include crisis intervention services so participants may become more able to perform Welfare-to-Work activities and receive supportive services.

Also the county should develop procedures to implement requirements for LD screening and waiver as the current practice of relying on participant's to self-report LD does not meet the CDSS requirements. Guidance to counties on the subject of learning disability screening and waiver is found in the CDSS' ACL 04-48 and ACL 01-70.

The county should collaborate with local mental health and substance abuse agencies to ensure referrals for these needs are addressed timely. Further guidance on this can be referenced in MPP 42-716.5

As mentioned in MPP 42-750.21 the county is required to provide advance payment of childcare services to former clients who are under a WTW sanction and are in the process of curing their sanction.

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